

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

IN RE: § CASE NO. 10-50128-LMC
BENTLEY ENERGY § Joint Administration Requested
CORPORATION §
§ Debtor-in-Possession § CHAPTER 11 CASE

DEBTOR'S EX PARTE MOTION FOR JOINT ADMINISTRATION

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW Bentley Energy Corporation, the debtor and debtor in possession in the above-captioned cases (the "Debtor") hereby files this Motion for entry of an order under Rule 1015 of the Federal Rules of Bankruptcy Procedure and Rule 1015 of the Local Court Rules of the United States Bankruptcy Court for the Western District of Texas authorizing joint administration, ex parte, for procedural purposes only, of the chapter 11 cases commenced by Bentley Energy Corporation and Sonterra Energy Corporation.

In support of the Motion, the Debtors respectfully submit: as follows:

JURISDICTION

1. The Court has jurisdiction to consider this Motion under 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. § 157(b). Venue of these cases and this Motion in this district is proper under 28 U.S.C. §§ 1408 and 1409. The statutory predicates for the relief requested herein are Bankruptcy Rule 1015 and Local Rule 1015.

RELIEF REQUESTED

2. On January 8, 2010, the Debtors each filed a voluntary case under chapter 11 of the Bankruptcy Code. This motion seeking joint administration of the Debtors' cases is filed contemporaneously with the two petitions.

3. The Debtors in the above-referenced case respectfully request joint administration.

4. Joint Administration is appropriate because the Debtors' primary secured creditor, Western National Bank, has liens on all of the assets of both Debtors and those liens are cross-collateralized.

5. Budgets proposed for debtor-in-possession financing or for the use of cash collateral will, of necessity, be joint budgets.

6. However, any plan of reorganization will have to take into consideration the assets and liabilities of the separate companies.

7. By this Motion, the Debtors seek entry of an order, pursuant to Bankruptcy Rule 1015 and Local Rule 1015, directing joint administration of the following cases under the Bentley Energy Corporation chapter 11 case which has not been assigned a case number, for procedural purposes only:

Bentley Energy Corporation
Sonterra Energy Corporation

Case No. 10-50128-LMC
Case No. 10-50129-RBK

BASIS FOR RELIEF

8. Bankruptcy Rule 1015(b) allows the Court to jointly administer the estates if two or more petitions are pending in the same court by or against a debtor and an affiliate. See Fed. R. Bankr. P. 1015(b)(4).

9. The Debtors anticipate numerous filings, notices and orders in this bankruptcy. In order to avoid duplicative filings and repeated service lists, the Debtors request the Court to jointly administer these two cases. The failure to jointly administer will be wasteful and unnecessarily burdensome to the Court.

10. Joint administration will allow parties in interest and their counsel to use a single caption on the documents that will be filed and served and file these papers in one case rather than two cases. Furthermore, it will ensure that parties in interest are apprised of all matters in both cases.

11. Recognizing that joint administration is procedural in nature, the Debtors request that the Court direct that any creditor filing a proof of claim against either of the Debtors clearly assert its claim against the particular Debtor obligated on such claim.

12. Bankruptcy courts routinely order joint administration of cases involving two or more entities. No party will be prejudiced by virtue of the relief requested in this Motion.

13. For these reasons, the Debtors submit that the relief requested herein is in the best interest of the Debtors, their estates, creditors and other parties in interest; therefore the motion should be granted.

WHEREFORE, PREMISES CONSIDERED, Bentley Energy Corporation and Sonterra Energy Corporation pray that the Court enter an Order granting the following relief:

1. Joint administration of Bentley Energy Corporation and Sonterra Energy Corporation.

2. The caption for the two jointly administered corporations be recognized as Bentley Energy Corporation.

Respectfully submitted,

LANGLEY & BANACK, INCORPORATED
745 E. Mulberry, Suite 900
San Antonio, TX 78212
Telephone: (210) 736-6600
Facsimile: (210) 735-6889

By: _____

R. GLEN AYERS, JR.
State Bar No. 01467500

Proposed Attorney for Bentley Energy
Corporation, Debtor-in-Possession

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing has been mailed by facsimile transmission and/or U.S. First Class Mail to the parties listed on the attached service list on this the 9 day of January, 2010.

R. GLEN AYERS, JR.

Debtor(s): Bentley Energy Corporation

Case No:
Chapter: 11

WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

A-1 Scale Service, Inc.
4807 NW Industrial Drive
San Antonio, TX 78238

AT&T
PO Box 650661
Dallas, TX 75265-0661

Card Service Center
PO Box 569100
Dallas, TX 75356-9100

Adams Garden Irrigation District
P.O. Box 148
Harlingen, TX 78551

AT&T Mobility
P.O. Box 6463
Carol Stream, IL 60197-6463

Card Services
PO Box 569100
Dallas, TX 75356

ADT Security Services
PO Box 650485
Dallas, TX 75265-0485

Bergquist, Inc.
PO Box 351330
Toledo, OH 43635-1330

Card Services
P.O. Box 569100
Dallas, TX 75356-9100

Aetna
P.O. Box 894913
Los Angeles, CA 90189

Berry
100 Executive Parkway
Hudson, OH 44236-1630

Carquest Auto Parts
PO Box 849895
Dallas, TX 75284-9895

AFLAC Insurance Company
1932 Wynnton Road
Columbus, Georgia 31999-0797

Bobby Cantrell
c/o Jerry L. Stapleton
Stapleton, Curtis & Boswell, LL
515 E. Harrison, Ste. A
Harlingen, TX 78550

Cathy C. Talcott, Tax Assessor-
205 N. Seguin Avenue
New Braunfels, TX 78130

Airgas Southwest
P.O. Box 676031
Dallas, TX 75267-6031

Brownsville Communication Servi-
PO Box 6155
Brownsville, TX 78523

Central Air & Heat
2224 S. Sunshine Strip
Suite 96, PMB #120
Harlingen, TX 78550

Allstar Office Solutions
PO Box 129
Santa Rosa, TX 78593

Buffalo Business Products
PO Box 185399
Fort Worth, TX 76181-0399

Centre Plaza
PO Box 82552
Goleta, CA 93118-2552

American Solutions for Business
NW # 7794 PO Box 1450
Minneapolis, MN 55485-7794

Business Card
PO Box 15710
Wilmington, DE 79886-5710

City of Donna Tax Assessor
301 S. 12th Street
Donna, TX 78337

AmeriPride Linen
PO Box 9055
Corpus Christi, TX 78469-9055

Camacho's Auto Repair
4818 Eldridge
San Antonio, TX 78237

City of San Antonio
Development Services Department
PO Box 839966
San Antonio, TX 78205

Argus Security Systems
PO Box 41425
Philadelphia, PA 19101

Cameron County Tax Assessor-Col
PO Box 952
Brownsville, TX 78522

City of Seguin
205 N. River
Seguin, TX 78155

Debtor(s): **Bentley Energy Corporation**

Case No:
Chapter: 11

WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

Commercial Billing Service
PO Box 2201
Decatur, AL 35609-2201

EO & IE Sharp Family Partnership
d/b/a Sharp Family Partnership
PO Box 461
San Antonio, TX 78205

Compass Bank
PO Box 192
Birmingham, AL 35201-0192

Eric Orme
630 FR 180
Helotes, TX 78023

GCR Truck Tire Center
1402 N. 77 Sunshine Strip
Harlingen, TX 78550

Continental Utility Solutions,
PO Box 1515
Jonesboro, AR 72403-1515

Ernesto Galvan (Valley Propane)

Gillman Auto Group
PO Box 2246
Harlingen, TX 78551

Crown Janitorial Services
PO Box 3388
Harlingen, TX 78551

Ferguson Enterprises, Inc.
PO Box 847411
Dallas, TX 75284-7411

GVEC
PO Box 118
Gonzales, TX 78629-0118

Danny Payton Electric
27484 S. Bass Blvd.
Harlingen, TX 78552

Ferrellgas
PO Box 1003
Liberty, MO 64069

Harlingen Waterworks
PO Box 1950
Harlingen, TX 78551-1950

DCP DGL Services
JP Morgan Chase Bank
P.O. Box 201209
Houston, TX 77216-1209

First Source Servall
PO Box 671589
Dallas, TX 75267-1589

Hays County Tax Office
Ruth Clayton
102 LBJ, Courthouse Annex
San Marcos, Texas 78666

Dick Office Supply
1009 S. 77 Sunshine Strip
Harlingen, TX 78550

Gajeske, Inc.
2929 Antoine Drive
Houston, TX 77092-7045

Henry's Cash & Carry
PO Box 532376
Harlingen, TX 78553

Direct Energy
PO Box 650272
Dallas, TX 75265-0272

Garnett Causey
c/o Jerry L. Stapleton
Stapleton, Curtis & Boswell
515 E. Harrison, Ste. A
Harlingen, TX 78550

IESI-Austin
PO Box 141697
Austin, TX 78714

Direct Propane Services
PO Box 619
Manor, TX 78653-0619

Gas Equipment Company
P.O. Box 29242
Dallas, TX 75229-0242

Ikon Financial Services
PO Box 650016
Dallas, TX 75265-0016

Enterprise Products
PO Box 972866
Dallas, TX 75397-2866

Gas Service Corp.
8707 Troga Pass
Helotes, TX 78023

Izquierdo Family Practice
24750 Stuart Place Rd
Harlingen, TX 78552

Debtor(s): **Bentley Energy Corporation**

Case No:
Chapter: **11**

WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

JCF Communications
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Austin, TX 78704

Lasar Lux
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Mercedes, TX 78570

Meeder Equipment Company
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Fresno, CA 93777-2446

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Harlingen, TX 78550

Leran Gas Products
PO Box 404295
Atlanta, GA 30384-4295

Merrill Lynch
P.O. Box 7247-0209
Philadelphia, PA 19170-0209

Johnny's True Value
914 West Tyler
Harlingen, TX 78550

Lone Star Paving Co.
PO Box 91862
Austin, TX 78709-1862

Microsoft Financing
CIT Technology Fin Serv., Inc.
PO Box 550599
Jacksonville, FL 32255-0599

K Marketing, Inc.
PO Box 2030
Canyon Lake, TX 78133

Loyal American Life Insurance
PO Box 1604
Duncan, OK 73534-1604

Monroe Calculator Company
Lockbox 52873
PO Box 8500
Philadelphia, PA 19178-2873

Ken's Automotive Supply
205 South Gate #3
Harlingen, TX 78552

Luckey Feed Lot
PO Drawer 1150
Devine, TX 78016

Neopost
30955 Huntwood Avenue
Hayward, CA 94544

Kendall Appraisal District
PO Box 788
Boerne, TX 78006-0788

M&S Engineering, Ltd.
PO Box 970
Spring Branch, TX 78070

North American Satellite Corp.
PO Box 1778
Goodlettsville, TN 37070-1778

Key Equipment
PO Box 74713
Cleveland, OH 44194-0796

M. Marshall

O'Reilly Auto Parts
PO Box 790098
St. Louis, MO 63179-0098

Landmark American Insurance Com:

Malone & Bailey
2925 Bnarpark Drive
Suite 930
Houston, TX 77042

Office of Tavie Murphy
Tax Assessor-Collector
Guadalupe Tax Office
307 W. Court Street
Seguin, TX 78155

Lane McDuff
PO Box 14311
Fort Worth, TX 76117

Marshall Distributing
PO Box 200186
San Antonio, TX 78220

Olivera Garza

Langley & Banack, Inc.
745 E Mulberry Ave.
STE 900
San Antonio, TX 78212-3166

Marshall Propane
PO Box 200186
San Antonio, TX 78220

Ozarka
PO Box 856680
Louisville, KY 40285-6680

Debtor(s): Bentley Energy Corporation

Case No:
Chapter: 11

WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

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San Antonio, TX 78216

Raymond's Automatic Transmission
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Sentry Technologies, Inc.
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Houston, TX 77215-2258

Pedernales Electric Corp.
PO Box 1
Johnson City, TX 78636

Reynaldo's Tire Shop
P.O. Box 1545
Los Fresnos, TX 78566

SGS Industrial Supplies
2771 Robindale
Brownsville, TX 78526

Pena's Electric Inc.
23899 Wilcox Road
Harlingen, TX 78552

RSC Equipment Rental
PO Box 840514
Dallas, TX 75284-0514

Sherwin Williams
550 N. Hwy 123, # 196
Seguin, TX 78155

Pickett Systems
PO Box 27, Dept. 00
Houston, TX 77001

Rural Computer Consultants
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PO Box 197
Bird Island, MN 55310

Sprint
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Dallas, TX 75266-0075

Pitney Bowes Global Financial
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Louisville, KY 40285-6460

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Dallas, TX 75265-0509

Sprint
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Dallas, TX 75266-0075

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Idealease of San Antonio
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San Antonio, TX 78219

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Mercedes, TX 78570

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Seguin, TX 78155

Ted Vega
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Rio Hondo, TX 78583

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Abilene, TX 79601

Seguin Welding
12100 FM 725
Seguin, TX 78155

Tejas Transport Co.
PO Box 10427
Corpus Christi, TX 78460

Texas Excavation Safety System,
PO Box 678058
Dallas, TX 75267-8058

Valley Ditch Witch, Inc.
949 Cantwell
Corpus Christi, TX 78407

Texas Propane Gas Association
8408 N. IH-35
Austin, TX 78753

Valley Propane

Texas Propane Marketing
8408 N. IH-35
Austin, TX 78753

Victoria Steel Supply Inc.
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Donna, TX 78537

The Petroleum Club
8620 N. New Braunfels
San Antonio, TX 78217-6394

Waste Management
4730 SE Loop 410
San Antonio, TX 78222

Time Warner Cable
PO Box 660097
Dallas, TX 75266-0097

WNB

Trans Union, LLC
PO Box 99506
Chicago, IL 60693-9506

Yellow Book
PO Box 6448
Carol Stream, IL 60197

Travis Downing
2612 Connie Drive
Canyon Lake, TX 78133

Zee Medical
PO Box 781591
Indianapolis, IN 46278-8591

Trimble Navigation Limited
Dept. 33209
PO Box 39000
Sunnyvale, CA 94085

ZEP Sales & Service
PO Box 841508
Dallas, TX 75284-1508

Valero Marketing & Supply Co.
PO Box 300
Amarillo, TX 79105-0300

Valley Bottle Water
1401 SPID
Corpus Christi, TX 78416